

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Front Line Manufacturing
County Road 2466, North 200 West
Warsaw, Indiana 46538**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-10773-00077	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary shower tub and sink manufacturing operation.

Responsible Official: Ray Doss
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Phone Number: 219-269-1794
SIC Code: 3714
County Location: Kosciusko
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively;
- (b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X;
- (c) one (1) marble spray gun, identified as (SG4), with a maximum capacity of 7.2 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X;
- (d) one (1) marble casting operation, identified as (MC), with a maximum capacity of 44.84 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X;
- (e) two (2) gel spray guns, identified as (SG5 and SG6), each with a maximum capacity of 210.7 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG5X and SG6X, respectively;
- (f) three (3) chop spray guns, identified as (SG7, SG8 and SG9), each with a maximum capacity of 797.3 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to three (3) stacks identified as SG7X, SG8X and SG9X, respectively;
- (g) fifteen (15) trimmer saws, identified as (T2A-T2O), with a maximum capacity of 2,040 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to the interior of the building; and

- (h) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to stack GX.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) air makeup unit with a rated heat input of 2.75 million British thermal units (mmBtu) per hour;
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to stack TX.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively;
- (b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X;
- (c) one (1) marble spray gun, identified as (SG4), with a maximum capacity of 7.2 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X; and
- (d) one (1) marble casting operation, identified as (MC), with a maximum capacity of 44.84 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel and chop spray guns (ID SG1-SG4) shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 47 tons (see Condition D.1.2), per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:

- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
- (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.2.1(b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP085-8900-00077, issued on February 17, 1998, and 326 IAC 8-1-6 (General Reduction Requirements):

- (a) Limiting the total resin input at 535.71 tons per year from the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the 5.6 percent flash off for non vapor suppressed (NVS) resin.
- (b) Limiting the total resin input at 115.65 tons per year from the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the 14.7 percent flash off for non vapor suppressed (NVS) gel coat.

BACT for the gel and chop spray guns (ID SG1-SG3) shall be satisfied by the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) specified in Condition D.1.1. Compliance with this condition and Condition D.1.1 shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable to this source.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
chop spray gun ID SG1	0.29	1.77
chop spray gun ID SG2	0.29	1.77
gel spray gun ID SG3	0.11	0.93
marble casting spray gun ID SG4	0.00	0.10
Marble Casting ID MC	0.02	0.32

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM compliance with the VOC limit specified in Condition D.1.2 and the HAP limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.1.2 and the monomer content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel and chop spray guns (ID SG1-SG4) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel spray gun, chop spray gun and marble casting stacks (ID SG1X-SG4X) while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the volatile organic HAP emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month. The total volatile organic HAP emissions recorded each month shall reflect the total VOC use for that month.
- (b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) two (2) gel spray guns, identified as (SG5 and SG6), each with a maximum capacity of 210.7 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG5X and SG6X, respectively; and
- (b) three (3) chop spray guns, identified as (SG7, SG8 and SG9), each with a maximum capacity of 797.3 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to three (3) stacks identified as SG7X, SG8X and SG9X, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the two (2) gel spray guns, identified as (SG5 and SG6) and three (3) chop spray guns, identified as (SG7, SG8 and SG9) shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons, per twelve (12) consecutive months, based on the following:
 - (1) Limiting the total resin input at 153.06 tons per year from each of the two (2) Gel Spray Guns (SG 5 and SG6). This is equivalent to 22.5 tons per year of VOC emissions from each of the two (2) Gel Spray Guns (SG 5 and SG6), based on the 14.7 percent flash off for gel coats.
 - (2) Limiting the total unsaturated polyester resin input at 438.8 tons per year from each of the three (3) Chop Spray Guns (SG7, SG8 and SG9). This is equivalent to 18.3 tons per year of VOC emissions from each of the chop spray guns, based on the 4.17 percent flash off for unsaturated polyester resin.

Compliance with this limit shall be determined based upon the following criteria:

- (3) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (4) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:
- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
 - (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.2.1(b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 8-1-6 the gel and chop spray guns (ID SG5-SG9) are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for the gel and chop spray guns (ID SG5-SG9) shall be satisfied by the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) specified in Condition D.2.1. Compliance with this condition and Condition D.2.1 shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable to this source.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
gel spray gun ID SG5	0.11	0.93
gel spray gun ID SG6	0.11	0.93
chop spray gun ID SG7	0.40	2.22
chop spray gun ID SG8	0.40	2.22
chop spray gun ID SG9	0.40	2.22

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM compliance with the VOC limit specified in Condition D.2.1 and the HAP limit specified in condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.2.1 and the monomer content and usage limitations contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC and HAP Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel and chop spray guns (ID SG5-SG9) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel and chop spray gun stacks (ID SG5X-SG9X) while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the volatile organic HAP emission limits established in Conditions D.2.1 and D.2.2.
 - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month. The total volatile organic HAP emissions recorded each month shall reflect the total VOC use for that month.
- (b) To document compliance with Conditions D.2.8 and D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) fifteen (15) trimmer saws, identified as (T2A-T2O), with a maximum capacity of 2,040 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to the interior of the building;
- (b) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to stack GX.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
fifteen (15) trimmer saws, ID (T2A-T2O)	1.02	4.15
Hand Grinder IDG	0.06	0.59

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no Compliance Monitoring Requirements for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

There are no Record Keeping and Reporting Requirements for these facilities.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) air makeup unit with a rated heat input of 2.75 million British thermal units (mmBtu) per hour; and
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to stack TX.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the grinding and machining operation is as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Hand Saw ID T	0.02	0.30

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077
Facility: gel and chop spray guns (ID SG1-SG2)
Parameter: volatile organic compound (VOC) input
Limit:

The total resin input is limited at 230.8 tons per year from the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the 5.6 percent flash off for non vapor suppressed (NVS) resin.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077
Facility: gel and chop spray guns (ID SG3)
Parameter: volatile organic compound (VOC) input
Limit: The total resin input is limited at 115.65 tons per year from the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the 14.7 percent flash off for non vapor suppressed (NVS) gel coat.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077
Facility: two (2) gel spray guns, identified as (SG5 and SG6)
Parameter: volatile organic HAP
Limit: Limiting the total resin input at 153.1 tons per year from each of the two (2) Gel Spray Guns (SG 5 and SG6). This is equivalent to 22.5 tons per year of VOC emissions from each of the two (2) Gel Spray Guns (SG 5 and SG6), based on the 14.7 percent flash off for gel coats.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077
Facility: three (3) chop spray guns, identified as (SG7, SG8 and SG9)
Parameter: volatile organic HAP
Limit: Limiting the total unsaturated polyester resin input at 438.8 tons per year from each of the three (3) Chop Spray Guns (SG7, SG8 and SG9). This is equivalent to 18.3 tons per year of VOC emissions from each of the chop spray guns, based on the 4.17 percent flash off for unsaturated polyester resin.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Front Line Manufacturing
Source Address: County Road 2466, North 200 West, Warsaw, Indiana 46538
Mailing Address: P.O. Box 176, Leesburg, Indiana 46538
Operating Permit No.: T085-10773-00077

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Front Line Manufacturing
Source Location:	County Road 2466, North 200 West, Warsaw, Indiana 46538
County:	Kosciusko
SIC Code:	3714
Operating Permit No.:	T085-10773-00077
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Front Line Manufacturing relating to the operation of a shower tub and sink manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) two (2) chop spray guns, identified as (SG1 and SG2), each with a maximum capacity of 572 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG1X and SG2X, respectively;
- (b) one (1) gel spray gun, identified as (SG3), with a maximum capacity of 216 pounds of gel coat, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG3X;
- (c) one (1) marble spray gun, identified as (SG4), with a maximum capacity of 7.2 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X;
- (d) one (1) marble casting operation, identified as (MC), with a maximum capacity of 44.84 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to one (1) stack identified as SG4X;
- (e) two (2) gel spray guns, identified as (SG5 and SG6), each with a maximum capacity of 210.7 pounds of resin, catalyst and mold release per hour, using dry filters as particulate control, and exhausting to two (2) stacks identified as SG5X and SG6X, respectively;
- (f) three (3) chop spray guns, identified as (SG7, SG8 and SG9), each with a maximum capacity of 797.3 pounds of resin and catalyst per hour, using dry filters as particulate control, and exhausting to three (3) stacks identified as SG7X, SG8X and SG9X, respectively;

- (g) fifteen (15) trimmer saws, identified as (T2A-T2O), with a maximum capacity of 2,040 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to the interior of the building; and
- (h) one (1) hand grinder, identified as (G), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to stack GX.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) air makeup unit with a rated heat input of 2.75 million British thermal units (mmBtu) per hour;
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months, and
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) one (1) hand saw, identified as (T), with a maximum capacity of 969 pounds of reinforced polyester plastic per hour, using a dust collection system as particulate control, and exhausting to stack TX.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP085-8900-00077, issued on February 17, 1998, and
- (b) Source Modification No. SSM085-10774-00077, issued on July 22, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP085-8900-00077, issued on February 17, 1998.

Condition 12:

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements),

- (a) The total VOC input is limited at 33.90 tons per year for the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the 13 percent flash off for non vapor suppressed (NVS) resin.

- (b) The total VOC input is limited at 22.95 tons per year for the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the 35 percent flash off for non vapor suppressed (NVS) gel coat.
- (c) The styrene monomer content of each individual resin used in the chop spray area (SG #1 & 2) and gel coating area (SG #3) shall not exceed 35 percent by weight.
- (d) The following pollution preventing techniques are applied:
 - (i) The overspray shall be minimized by spraying as close a practical into the molds;
 - (ii) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air;
 - (iii) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;
 - (iv) All solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;
 - (v) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use;
 - (vi) Cleanup rags saturated with solvent shall be stored, transported , and disposed of in containers that are closed tightly;
 - (vii) Proper equipment clean-up and maintenance; and
 - (viii) Proper testing of spray guns prior to daily use.These requirements will also satisfy the requirements of 326 IAC 2-1.3.4.

Reasons not incorporated:

After the issuance of CP085-8900-00077, IDEM issued a presumptive MACT which applies to the operations conducted at this source. Although the existing permit states that BACT shall satisfy the requirements of MACT, the emission units permitted under CP085-8900-00077 must still comply with the requirements of 326 IAC 2-4.1-1, since these emission units were constructed after the applicability date of July 27, 1997. Compliance with the presumptive MACT requirements will satisfy all but the VOC input limitations of the existing BACT (paragraphs (a) and (b) of Condition 12 in CP085-8900-00077). Therefore, these emission units must comply with requirements to show compliance with 326 IAC 2-4.1-1, and must also limit VOC emissions as required by 326 IAC 8-1-6. On page 6 of 12 of the Technical Support Document under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the following language was added to reflect the usage of new emission factors for the fiberglass industries and to state that the rule citation for New Source Toxics Control is now encoded at 326 IAC 2-4.1-1 (formerly 326 IAC 2-1.3.4).

Due to the usage of the new emission factors for the fiberglass industry (emission factors obtained from "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, Feb. 28, 1998), the calculated potential VOC emissions for the Gel and Chop Spray guns (SG1-4) were increased from 218 to 274 tons per year. The source has committed to limit potential to emit VOC from Gel and Chop spray guns to 47 tons per year, which was established in CP085-8900-00077 as a requirement of BACT, issued on February 17, 1998.

- (a) Based on the new flash off factors for the two (2) Chop Spray Guns (SG #1&2), VOC emissions from the facility are limited to 30 tons per year.
 - New resin input limit = VOC output limit / (flash off for NVS resin)
 - = 30.0 tons per year / (5.6% flash off for NVS resin coat)
 - = 535.71 tons per year

The total ~~VOC~~ **resin** input is limited at ~~33.90~~ **535.71** tons per year from the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the ~~13~~-**5.6** percent flash off for non vapor suppressed (NVS) resin.

- (b) Based on the new flash off factors for one (1) Gel Coat Spray Gun (SG3), VOC emissions from the facility are limited to 17 tons per year.
New gel coat input limit = VOC output limit / (flash off for NVS resin)
= 17.0 tons per year / (14.7% flash off for NVS gel coat)
= 115.65 tons per year

The total ~~VOC~~ **gel coat** input is limited at ~~22.95~~ **115.65** tons per year from the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the ~~35~~-**14.7**percent flash off for non vapor suppressed (NVS) gel coat.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
GX	Hand Grinder	23	2.5	10,000	68
TX	Hand Saw	29	2.5	10,000	68
SG1&2	Chop Gun	27.3	3.5	18,000	68
SG3	Gel Gun	28.7	2.5	10,000	68
SG4	Marble Gun	27.5	2.5	10,000	68
SG5X	Gel Gun	24.0	1.5	5,500	68
SG6X	Gel Gun	24.0	1.5	5,500	68
SG7X	Chop Gun	24.0	1.5	5,500	68
SG8X	Chop Gun	24.0	1.5	5,500	68
SG9X	Chop Gun	24.0	1.5	5,500	68
Air Makeup	Air Makeup	20.0	1.0	N/A	N/A

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on March 19, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 12.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	711.72
PM-10	711.72
SO ₂	0.01
VOC	964.90
CO	1.01
NO _x	1.20

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	941.17
MEKP	2.85
Toluene	12.70
Dimethyl Phthalate	3.85
TOTAL	960.58

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the source emissions summary submitted by the source on April 26, 1999.

Pollutant	Emissions (ton/yr)
PM	0.41
PM-10	0.41
SO ₂	0.00
VOC	18.09
CO	0.00
NO _x	0.00
HAP (toluene)	0.40
HAP (Dimethyl phthalate)	0.09
HAP (methyl ethyl ketone)	0.18
HAP (styrene)	17.38
Total HAPs	18.05

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Any Single HAP	Total HAPs
SG 1, 2	9.60	9.60	0.00	30.00	0.00	0.00	29.89 (styrene)	30.00
SG3	2.11	2.11	0.00	17.00	0.00	0.00	16.46 (styrene)	17.00
SG 4, MC	0.18	0.18	0.00	6.16	0.00	0.00	2.82 (styrene)	2.19
SG5, 6, 7, 8, 9	22.74	22.74	0.00	99.00	0.00	0.00	96.50 (styrene)	98.84
GX, TX	1.19	1.19	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.09	0.09	0.01	0.07	1.01	1.20	0.00	0.00
Total Emissions	35.67	35.67	0.01	152.23	1.01	1.20	145.67 (styrene)	148.70

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

- (a) 326 IAC 2-4.1-1 (New Source Toxics Control) requires that the total volatile organic HAP emissions from the two (2) gel spray guns, identified as SG5 and SG6 and three (3) chop spray guns, identified as SG7, SG8 and SG9, shall be limited to less than 100 tons per twelve (12) consecutive months.
- (1) This operation limitation is equivalent to limiting the total resin input at 153.1 tons per year from each of the two (2) Gel Spray Guns (SG 5 and SG6). This is equivalent to 22.5 tons per year of VOC emissions from each of the two (2) Gel Spray Guns (SG 5 and SG6), based on the 32 percent styrene monomer and 5.6 percent flash off for controlled spraying of gel coats, and
- (2) This operation limitation is equivalent to limiting the total unsaturated polyester resin input at 438.8 tons per year from each of the three (3) Chop Spray Guns (SG7, SG8 and SG9). This is equivalent to 18.3 tons per year of VOC emissions from each of the chop spray guns, based on the 33 percent styrene monomer and 4.17 percent flash off for controlled spraying of unsaturated polyester resin.
- (b) Pursuant to CP 085-8900-00077, issued on February 17, 1998, the source shall satisfy the requirements of 326 IAC 8-1-6 (General Reduction Requirements) by limiting the total resin input to 535.71 tons per year from the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the 5.6 percent flash off for non vapor suppressed (NVS) resin.

- (c) Also pursuant to CP 085-8900-00077, issued on February 17, 1998, the source shall satisfy the requirements of 326 IAC 8-1-6 (General Reduction Requirements) by limiting the total resin input to 115.65 tons per year from the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the 14.7 percent flash off for non vapor suppressed (NVS) gel coat.
- (d) The potential VOC emissions from SG4 and MC are 6.16 tons per year, and the potential VOC emissions from insignificant activities are 0.07 tons per year.

The limited potential to emit VOC from the entire source, therefore, is 152.23 tons per twelve (12) consecutive months (i.e., 99 tons per twelve (12) consecutive months + 30 tons per twelve (12) consecutive months + 17 tons per twelve (12) consecutive months + 6.16 tons per twelve (12) consecutive months + 0.07 tons per twelve (12) consecutive months = 152.23 tons per twelve (12) consecutive months). This source is not considered as a major stationary source because it is not one of the 28 listed source categories and it does not have the potential to emit 250 tons or more of any regulated pollutant. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel and chop spray guns (ID SG1-SG4), two (2) gel spray guns, identified as (SG5 and SG6) and three (3) chop spray guns, identified as (SG7, SG8 and SG9) are subject to the requirements of MACT. These facilities, which were all constructed after the rule applicability date of July 27, 1997, will be operating in accordance with the presumptive MACT approved by IDEM for this type of operation. The requirements of presumptive MACT are described as follows:

- (1) Use of resins and gel coats in the two (2) Gel Spray Guns (SG 5, SG6, SG7, SG8 and SG9) shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons, per twelve (12) consecutive months, based on the following:

- (A) Limiting the total resin input at 150.3 tons per year from each of the two (2) Gel Spray Guns (SG 5 and SG6). This is equivalent to 22.5 tons per year of VOC emissions from each of the two (2) Gel Spray Guns (SG 5 and SG6), based on the 32 percent styrene monomer and 14.7 percent flash off for controlled spraying of gel coats.

$$\begin{aligned}\text{Gel coat input limit} &= \text{VOC output limit} / (\text{flash off for NVS resin}) \\ &= 22.5 \text{ tons per year} / (14.7\% \text{ flash off for NVS resin coat}) \\ &= 150.3 \text{ tons per year}\end{aligned}$$

- (B) Limiting the total unsaturated polyester resin input at 438.0 tons per year from each of the three (3) Chop Spray Guns (SG7, SG8 and SG9). This is equivalent to 18.3 tons per year of VOC emissions from each of the chop spray guns, based on the 33 percent styrene monomer and 4.17 percent flash off for controlled spraying of unsaturated polyester resin.

$$\begin{aligned}\text{Resin input limit} &= \text{VOC output limit} / (\text{flash off for NVS resin}) \\ &= 18.3 \text{ tons per year} / (4.17\% \text{ flash off for NVS gel coat}) \\ &= 438.0 \text{ tons per year}\end{aligned}$$

Compliance with this limit shall be determined based upon the following criteria:

- (A) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (2) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (3) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:
- (A) to apply 50% of all neat resins within 6 months of commencement of operation.
 - (B) to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in (b) above, elsewhere in the process.

- (4) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (5) The listed work practices shall be followed:
- (A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (B) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

- (D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (E) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (F) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the source shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of allowable emissions in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
chop spray gun ID SG1	0.29	21.62	95.00%	1.08	1.77
chop spray gun ID SG2	0.29	21.62	95.00%	1.08	1.77
gel spray gun ID SG3	0.11	9.19	95.00%	0.46	0.93
marble casting spray gun ID SG4	0.00	0.32	95.00%	0.02	0.10
Marble Casting ID MC	0.02	4.84	95.00%	0.24	0.32
gel spray gun ID SG5	0.11	8.96	95.00%	0.45	0.93
gel spray gun ID SG6	0.11	8.96	95.00%	0.45	0.93
chop spray gun ID SG7	0.40	28.58	95.00%	1.43	2.22
chop spray gun ID SG8	0.40	28.58	95.00%	1.43	2.22
chop spray gun ID SG9	0.40	28.58	95.00%	1.43	2.22
fifteen (15) trimmer saws, ID (T2A-T2O)	1.02	3.65	95.00%	0.18	4.15
Hand Saw ID T	0.02	1.71	95.00%	0.09	0.30
Hand Grinder IDG	0.06	4.84	95.00%	0.24	0.59

When operating with baghouses and dry filters as particulate control the gel and chop spray guns (ID SG1-SG9)Marble Casting ID MC, PM emissions from the fifteen (15) trimmer saws, identified as (T2A-T2O), Hand Saw ID T and Hand Grinder IDG are in compliance with 326 IAC 6-3-2 (Process Operations). The baghouses and dry filters shall be in operation at all times that the facilities are in operation.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

- (a) This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. Pursuant to 326 IAC 8-1-6 the gel and chop spray guns (ID SG5-SG9) are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for the gel and chop spray guns (ID SG5-SG9) shall be satisfied by the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).
- (b) Pursuant to CP 085-8900-00077, issued on February 17, 1998, the source shall satisfy the requirements of 326 IAC 8-1-6 (General Reduction Requirements) by:
- (1) Limiting the total resin input at 535.71 tons per year from the two (2) Chop Spray Guns (SG #1&2). This is equivalent to 30 tons per year of VOC emissions from the two (2) chop spray guns (SG #1&2), based on the 5.6 percent flash off for non vapor suppressed (NVS) resin.

$$\begin{aligned}\text{New VOC input limit} &= \text{VOC output limit} / (\text{flash off for NVS resin}) \\ &= 30.0 \text{ tons per year} / (5.6\% \text{ flash off for NVS resin coat}) \\ &= 535.71 \text{ tons per year}\end{aligned}$$

- (2) Limiting the total resin input at 115.65 tons per year from the one (1) Gel Coat Spray Gun (SG3). This is equivalent to 17 tons per year of VOC emissions from the spray gun, based on the 14.7 percent flash off for non vapor suppressed (NVS) gel coat.

$$\begin{aligned}\text{New VOC input limit} &= \text{VOC output limit} / (\text{flash off for NVS resin}) \\ &= 17.0 \text{ tons per year} / (14.7\% \text{ flash off for NVS gel coat}) \\ &= 115.65 \text{ tons per year}\end{aligned}$$

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The gel spray gun, chop spray gun and marble casting operations (ID SG1-SG4 and MC) have applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel, chop spray gun and marble casting stacks (ID SG1X-SG4X) while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the gel spray gun, chop spray gun and marble casting operations (ID SG1-SG4 and MC) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (a) The two (2) gel spray guns, identified as (SG5 and SG6) and three (3) chop spray guns, identified as (SG7, SG8 and SG9) have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel and chop spray gun stacks (ID SG5X-SG9X) while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, shall be considered a violation of this permit. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, shall be considered a violation of this permit. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the gel and chop spray gun stacks (ID SG5X-SG9X) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 4, 5, 6, 9 and 10 of 12)

Conclusion

The operation of this shower tub and sink manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T085-10773-00077**.

Appendix A: Emission Calculations

Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Natural Gas Combustion	chop spray guns (ID SG1 and SG2)	gel spray guns (ID SG3)	marble casting (ID SG4 and MC)	gel and chop spray guns (ID SG5 through SG9)	(ID GX, TX, T2A-T2O)	TOTAL
PM	0.09	189.41	40.25	3.46	454.77	23.74	711.72
PM10	0.09	189.41	40.25	3.46	454.77	23.74	711.72
SO2	0.01	0.00	0.00	0.00	0.00	0.00	0.01
NOx	1.20	0.00	0.00	0.00	0.00	0.00	1.20
VOC	0.07	222.04	140.75	6.16	595.88	0.00	964.90
CO	1.01	0.00	0.00	0.00	0.00	0.00	1.01
total HAPs	0.00	222.04	140.75	2.86	594.93	0.00	960.58
worst case single HAP	0.00	(styrene) 221.26	(styrene) 136.25	(styrene) 2.82	(styrene) 580.83	0.00	(styrene) 941.17

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Natural Gas Combustion	chop spray guns (ID SG1 and SG2)	gel spray guns (ID SG3)	marble casting (ID SG4 and MC)	gel and chop spray guns (ID SG5 through SG9)	(ID GX, TX, T2A-T2N and T2O)	TOTAL
PM	0.09	9.47	2.01	0.17	22.74	1.19	35.67
PM10	0.09	9.47	2.01	0.17	22.74	1.19	35.67
SO2	0.01	0.00	0.00	0.00	0.00	0.00	0.01
NOx	1.20	0.00	0.00	0.00	0.00	0.00	1.20
VOC	0.07	30.00	17.00	6.16	99.00	0.00	152.23
CO	1.01	0.00	0.00	0.00	0.00	0.00	1.01
total HAPs	0.00	30.00	17.00	2.86	98.84	0.00	148.70
worst case single HAP	0.00	(styrene) 29.89	(styrene) 16.46	(styrene) 2.82	(styrene) 96.50	0.00	(styrene) 145.67

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations

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Reinforced Plastics and Composites

Booth SG1&2

Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

SG1 Chop Spray (Open Molding Operations)

Material	Density (lb/gal)	Emission Factor% Styrene Monomer	VOCs resulting from non-styrene HAPs	Gallons per unit	Units per Hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC* per Year	PM tons per year	Transfer Efficiency
Catalyst										
Hi-Point 90	9.26	0.00	1.32%	0.11	6.40	0.09	2.14	0.39	1.46	95.00%
Gel Resin										
Aropol Resin	8.90	0.06	0.00	7.92	6.40	25.26	606.19	110.63	93.24	95.00%

SG2 Chop Spray (Open Molding Operations)

Material	Density (lb/gal)	Emission Factor% Styrene Monomer	VOCs resulting from non-styrene HAPs	Gallons per unit	Units per Hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC* per Year	PM tons per year	Transfer Efficiency
Catalyst										
Hi-Point 90	9.26	0.00	1.32%	0.11	6.40	0.09	2.14	0.39	1.46	95.00%
Gel Resin										
Aropol Resin	8.90	0.06	0.00	7.92	6.40	25.26	606.19	110.63	93.24	95.00%

Totals: **50.69** **1216.66** **222.04** **189.41**

Federal Potential Emissions (controlled):

	Material Usage Limitation (%)	Control Efficiency		Controlled VOC Pounds per Hour	Controlled VOC Pounds per Day	Controlled VOC Tons per Year	Controlled PM tons per Year
		VOC	PM				
Total Federal Potential Emissions:	86.49%	0.00%	95.00%	6.85	164.38	30.00	9.47

METHODOLOGY

All processes utilize spray layup application methods with transfer efficiencies of 95%.

Potential VOC Pounds per Hour = Density (lb/gal) * (Weight % Monomer + VOCs resulting from non-styrene HAPs) * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC Pounds per Day = Density (lb/gal) * (Weight % Monomer + VOCs resulting from non-styrene HAPs) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC Tons per Year = Density (lb/gal) * (Weight % Monomer + VOCs resulting from non-styrene HAPs) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Material usage limitation to maintain VOC emissions less than 30 tpy (BACT).

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Booth SG 3**

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Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

SG3 Open Molding Operations

Material	Density (lb/gal)	Emission Factor% Styrene Monomer	VOCs resulting from non-styrene HAPs	Gallons per unit	Units per Hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC* per Year	PM tons per year	Transfer Efficiency
Catalyst										
Hi-Point 90	9.26	0.00	1.32%	0.03	12.81	0.04	1.01	0.18	0.69	95.00%
Gel Resin										
White Marble	10.25	0.15	0.00	1.61	12.81	31.11	746.64	136.26	39.53	95.00%
Mold Release										
Omnix #1461	7.26	0.00	0.88	0.01	12.81	0.98	23.57	4.30	0.03	95.00%

Totals: 32.13 771.22 140.75 40.25

Federal Potential Emissions (controlled):

	Material Usage Limitation (%)	Control Efficiency		Controlled VOC Pounds per Hour	Controlled VOC Pounds per Day	Controlled VOC Tons per Year	Controlled PM tons per Year
		VOC	PM				
Total Federal Potential Emissions:	87.92%	0.00%	95.00%	3.88	93.15	17.00	2.01

METHODOLOGY

All processes utilize spray layup application methods with transfer efficiencies of 95%.

Potential VOC Pounds per Hour = Density (lb/gal) * (Weight % Monomer + VOCs resulting from non-styrene HAPs) * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC Pounds per Day = Density (lb/gal) * (Weight % Monomer + VOCs resulting from non-styrene HAPs) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC Tons per Year = Density (lb/gal) * (Weight % Monomer + VOCs resulting from non-styrene HAPs) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Material usage limitation to maintain VOC emissions less than 17 tpy (BACT).

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Booth SG 4 & MC**

Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

SG4 Open Molding Operations

Catalyst										
Hi-Point 90	9.26	0.00	1.32%	0.00	3.75	0.00	0.02	0.00	0.02	95.00%
Gel Resin										
White Marble	10.25	0.15	0.00	0.18	3.75	1.04	24.97	4.56	1.32	95.00%
Mold Release										
Omnix #1461	7.26	0.00	0.88	0.00	3.75	0.00	0.07	0.01	0.00	95.00%

MC Marble Casting

Catalyst										
Hi-Point 90	9.26	0.00	1.32%	0.01	3.75	0.01	0.12	0.02	0.08	95.00%
Casting Resin										
Polyester	9.83	0.04	0.00	0.26	3.75	0.36	8.59	1.57	2.04	95.00%

Grand Totals: **1.41** **33.77** **6.16** **3.46**

Federal Potential Emissions (controlled):

	Material Usage Limitation (%)	Control Efficiency		Controlled VOC Pounds per Hour	Controlled VOC Pounds per Day	Controlled VOC Tons per Year	Controlled PM tons per Year
		VOC	PM				
Total Federal Potential Emissions:	0.00%	0.00%	95.00%	1.41	33.77	6.16	0.17

METHODOLOGY

All processes utilize spray layup application methods with transfer efficiencies of 95%.

Potential VOC Pounds per Hour = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC Pounds per Day = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC Tons per Year = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

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Company Name: Front Line Manufacturing, Incorporated

Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538

Title V No: T085-7186-00077

Reviewer: Phillip Ritz/EVP

Date: 5/19/1999

Material	Density (Lb/Gal)	Material (gal/unit)	Maximum (unit/hour)	Weight % Styrene	Weight % MEKP	Weight % Toluene	Weight % Dimethyl Phthalate	Styrene (ton/yr)	MEKP (ton/yr)	Toluene (ton/yr)	Dimethyl Phthalate (ton/yr)
SG1 Chop Spray (Open Molding Operations)											
Catalyst											
Hi-Point 90	9.26	0.11	6.40		0.38%		0.94%	0.00	0.11	0.00	0.28
Gel Resin											
Aropol Resin	8.90	7.92	6.40	5.60%				110.63	0.00	0.00	0.00
SG2 Chop Spray (Open Molding Operations)											
Catalyst											
Hi-Point 90	9.26	0.11	6.40		0.38%		0.94%	0.00	0.11	0.00	0.28
Gel Resin											
Aropol Resin	8.90	7.92	6.40	5.60%				110.63	0.00	0.00	0.00

221.26	0.23	0.00	0.56
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222.04

Material Usage Limitation	Limited Emissions	Limited Emissions	Limited Emissions	Limited Emissions Dimethyl Phthalate
(%)	Styrene	MEKP	Toluene	
86.49%	29.89	0.03	0.00	0.08

Total Limited Emissions :

METHODOLOGY

30.00

$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

*Coating application is mutually exclusive, therefore the worst case HAP is used for calculations.

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Booth 2 Open Molding Operations

Total State Potential Emissions :	136.26	0.05	4.30	0.13
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Total Limited Emissions:

SG4 Open Molding Operations

Total State Potential Emissions :	2.82	0.01	0.01	0.02
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Total Limited Emissions :
$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CEA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

*Coating application is mutually exclusive, therefore the worst case HAP is used for calculations.

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Booth SG5**

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Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

SG5 Open Molding Operations

Material	Density (lb/gal)	Emission Factor% Styrene Monomer	VOCs resulting from non-styrene HAPs	Gallons per unit	Units per Hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC* per Year	PM tons per year	Transfer Efficiency
Catalyst										
Hi-Point 90	9.26	0.00%	3.99%	0.03	12.50	0.12	2.97	0.54	0.65	95.00%
Gel Resin										
Polydyne Gel Coat	9.85	14.70%	0.00%	1.61	12.50	29.17	700.14	127.78	37.07	95.00%
Mold Release										
Omniwax #1461	7.26	0.00%	98.00%	0.01	12.50	1.07	25.61	4.67	0.00	95.00%
Totals:						30.36	728.73	132.99	37.73	

SG6 Open Molding Operations										
Catalyst										
Hi-Point 90	9.26	0.00%	3.99%	0.03	12.50	0.12	2.97	0.54	0.65	95.00%
Gel Resin										
Polydyne Gel Coat	9.85	14.70%	0.00%	1.61	12.50	29.17	700.14	127.78	37.07	95.00%
Mold Release										
Omniwax #1461	7.26	0.00%	98.00%	0.01	12.50	1.07	25.61	4.67	0.00	95.00%
Totals:						30.36	728.73	132.99	37.73	

METHODOLOGY

all processes utilize spray layup application methods with transfer efficiencies of 95%.

Potential VOC Pounds per Hour = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC Pounds per Day = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC Tons per Year = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Booth SG5**

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Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

SG7 Chop Spray (Open Molding Operations)

Material	Density (lb/gal)	Emission Factor% Styrene Monomer	VOCs resulting from non-styrene HAPs	Gallons per unit	Units per Hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC* per Year	PM tons per year	Transfer Efficiency
Catalyst										
Hi-Point 90	9.26	0.00%	3.99%	0.11	8.33	0.35	8.44	1.54	1.85	95.00%
Neat Resin										
Unsaturated Polyester Resin	9.00	4.17%	0.00%	7.92	8.33	24.75	594.12	108.43	124.59	95.00%
Totals:						25.11	602.55	109.97	126.44	

SG8 Chop Spray (Open Molding Operations)

Catalyst										
Hi-Point 90	9.26	0.00%	3.99%	0.11	8.33	0.35	8.44	1.54	1.85	95.00%
Neat Resin										
Unsaturated Polyester Resin	9.00	4.17%	0.00%	7.92	8.33	24.75	594.12	108.43	124.59	95.00%
Totals:						25.11	602.55	109.97	126.44	

SG9 Chop Spray (Open Molding Operations)

Catalyst										
Hi-Point 90	9.26	0.00%	3.99%	0.11	8.33	0.35	8.44	1.54	1.85	95.00%
Neat Resin										
Unsaturated Polyester Resin	9.00	4.17%	0.00%	7.92	8.33	24.75	594.12	108.43	124.59	95.00%
Totals:						25.11	602.55	109.97	126.44	

Grand Totals: 136.05 3265.11 595.88 454.77

Federal Potential Emissions (controlled):

	Material Usage Limitation (%)	Control Efficiency		Controlled VOC Pounds per Hour	Controlled VOC Pounds per Day	Controlled VOC Tons per Year	Controlled PM tons per Year
		VOC	PM				
Total Federal Potential Emissions:	83.39%	0.00%	95.00%	22.60	542.47	99.00	22.74

METHODOLOGY

all processes utilize spray layup application methods with transfer efficiencies of 95%.

Potential VOC Pounds per Hour =Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC Pounds per Day =Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC Tons per Year = Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

Appendix A: Emission Calculations
HAP Emission Calculations for Booth S1

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Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

SG5 Open Molding Operations

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Styrene	Weight % MEKP	Weight % Toluene	Weight % Dimethyl Phthalate	Styrene (ton/yr)	MEKP (ton/yr)	Toluene (ton/yr)	Dimethyl Phthalate (ton/yr)
Catalyst											
Hi-Point 90	9.26	0.03	12.50		1.79%		2.20%	0.00	0.24	0.00	0.30
Gel Resin											
Polydyne Gel Coat	9.85	1.61	12.50	14.70%				127.78	0.00	0.00	0.00
Mold Release											
Omnwax #1461	7.26	0.01	12.50			88.00%		0.00	0.00	4.20	0.00

SG6 Open Molding Operations

Catalyst											
Hi-Point 90	9.26	0.03	12.50		1.79%		2.20%	0.00	0.24	0.00	0.30
Gel Resin											
Polydyne Gel Coat	9.85	1.61	12.50	14.70%				127.78	0.00	0.00	0.00
Mold Release											
Omnwax #1461	7.26	0.01	12.50			88.00%		0.00	0.00	4.20	0.00

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Emission Factor Styrene Monomer(%) = calculated % Styrene flash off from CFA Emission Calculations

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

*Coating application is mutually exclusive, therefore the worst case HAP is used for calculations.

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Booth 2 Open Molding Operations

594.93

Total Limited Emissions for Source:

98.84

Emission Factor VOC(%) = weight % VOC from MSDS (used on coatings w/o styrene)

*Coating application is mutually exclusive, therefore the worst case HAP is used for calculations.

**Appendix A: Emission Calculations
Woodworking & Plastics Machining**

Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

TRIMMING: GRAIN LOADING

Facility ID	GX	TX	T*	TOTALS
cfm	10,000.00	10,000.00	3,500.00	
lbs/hr particulate generated	0.05	1.71	3.65	
grains per minute	6.4	200	425.83	
gr/dscf	6.4E-04	2.0E-02	1.22E-01	
lbs pm generated per hour	0.05	1.71	3.65	
capture assumed	1.00	1.00	1.00	
efficiency of dry filter	0.95	0.95	0.95	
lbs emitted per hour	0.00	0.09	0.18	
lbs emitted per unit	0.00	0.01	0.01	
units per day	102.50	102.50	102.50	
units per hour	12.81	12.81	12.81	
tons MAXIMUM uncontrolled emissions per year	0.24	7.51	15.99	23.74
tons MAXIMUM controlled emissions per year	0.01	0.38	0.80	1.19

T*= Facility ID T2A ,T2B ,T2C ,T2D ,T2E ,T2F ,T2G ,T2H ,T2I ,T2J ,T2K ,T2L ,T2M ,T2N ,T2O

Facilities are to be 15 hand-held electrical or pneumatic trimming saws, manufacturer and model numbers to be determined.

Appendix A: Emission Calculations**Natural Gas Combustion****MM Btu/hr 0.3 - < 100**

Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: County Road 2466 North 200 West, Warsaw, Indiana 46538
Title V No: T085-7186-00077
Reviewer: Phillip Ritz/EVP
Date: 5/19/1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.8

24.1

Heat Input Capacity includes:

one (1) 2.75 mmBtu/hr air makeup unit, identified as air makeup

	Pollutant					
Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.09	0.09	0.01	1.20	0.07	1.01

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton